

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

April Shakoor-Delgado, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Cornerstone First Mortgage, LLC

Defendant.

Case No. 24-cv-05103

DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendant, Cornerstone First Mortgage, LLC (“Defendant”), by and through its attorneys, Gordon Rees Scully Mansukhani, LLP, and for its Unopposed Motion for a 28-Day Extension of Time to answer or otherwise plead to Plaintiff’s Complaint, states as follows:

1. Plaintiff filed her complaint on June 16, 2024.
2. Defendant was served with the Complaint on July 10, 2024 and the responsive pleading is currently due on July 31, 2024.
3. Defendant has recently retained the undersigned defense counsel who is simultaneously filing an Appearance with the instant motion.
4. The Defendant respectfully requests an extension in the amount of twenty eight (28) days, until August 26, 2024, to file its responsive pleading.
5. Counsel for Defendant has contacted counsel for Plaintiff about the instant motion, seeking a 28-day extension, and counsel has agreed to the extension.
6. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to pursue resolution of this matter, analyze the pleading, and prepare the appropriate response to the Complaint.

7. The Court has not yet set any dispositive motion deadlines in this matter, and the subject request for an extension will not affect any dispositive motion deadlines.

WHEREFORE, Defendant, CORNERTONE FIRST MORTGAGE, LLC, respectfully requests that this Court grant it a 28-day extension of time, up to and including August 26, 2024, to file a responsive pleading to Plaintiff's Complaint.

Dated: July 29, 2024

Respectfully submitted,

By: /s/ Brian M. Roth
Attorney for Defendant

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